

Klein Broadcast Engineering, L.L.C.

Job: SELIGMAN, AZ 227A.fmj

Master Database: 2002_MAR_29A.fmd

Lat: N35:19:26 Lon: W112:45:55

Channel: 227 Class: A

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Primary, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 30 km

Comments: NPR Reply Comments ENGINEERING EXHIBIT E-3

Proposed Channel Substitution for STATION KZKE(FM) at Existing Station coordinates.

Description:

Page 1 of 1

Date: 3/30/2002 12:23:52 PM

rfDetective-FM Version 1.3.4

Callsign	Latitude	Longitude	City	State	Service	Channel	Class	Status	Min Separation	Clearance	ERP	HAAT	Adjacency	Distance	Bearing
KDKB	N33:20:04	W112:03:36	MESA	AZ	FM	227 : 93.3 MHz	C	LIC	226	4.03	96.00	469	Primary	230.03	164
KADD	N35:01:58	W114:21:57	LAUGHLIN	NV	FM	228 : 93.5 MHz	C1	LIC	133	16.33	2.75	576	1st Adj	149.33	258
KMGN	N34:58:08	W111:30:28	FLAGSTAFF	AZ	FM	230 : 93.9 MHz	C	LIC	95	26.17	96.00	460	3rd Adj	121.17	109
KAFF-FM	N34:58:07	W111:30:24	FLAGSTAFF	AZ	FM	225 : 92.9 MHz	C	LIC	95	26.28	98.00	461	2nd Adj	121.28	109

Klein Broadcast Engineering, L.L.C.

Job: SELIGMAN, AZ 265 A.fmj

Master Database: 2002_MAR_29A.fmd

Lat: N35:19:26 Lon: W112:45:55

Channel: 265 Class: A

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Primary, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 30 km

Comments: NPR Reply Comments ENGINEERING EXHIBIT E-3A

Proposed Channel Substitution for STATION KZKE(FM) at Existing Station coordinates.

Description:

Page 1 of 1

Date: 3/30/2002 12:27:18 PM

rfDetective-FM Version 1.3.4

Callsign	Latitude	Longitude	City	State	Service	Channel	Class	Status	Min Separation	Clearance	ERP	HAAT	Adjacency	Distance	Bearing
KRRK	N34:33:06	W114:11:37	LAKE HAVASU CITY	AZ	FM	266 : 101.1 MHz	C0	CP	152	4.10	20.00	822	1st Adj	156.10	237
	N34:53:00	W112:28:00	PAULDEN	AZ	FM	263 : 100.5 MHz	C3	ADD	48	7.95	0.00	0	2nd Adj	55.95	151
NEW	N36:52:59	W114:33:13	LITTLEFIELD	AZ	FM	265 : 100.9 MHz	C	ADD	226	10.35	0.00	0	Primary	236.35	317
KESP	N34:25:48	W111:30:16	PAYSON	AZ	FM	266 : 101.1 MHz	C1	CP	133	19.06	57.00	377	1st Adj	152.06	131
KESP	N34:25:48	W111:30:16	PAYSON	AZ	FM	266 : 101.1 MHz	C1	LIC	133	19.06	77.00	326	1st Adj	152.06	131
KRRK(FM)	N34:33:06	W114:11:37	YUCCA	AZ	FM	266 : 101.1 MHz	C1	ADD	133	23.10	0.00	0	1st Adj	156.10	237
KRRK	N34:33:06	W114:11:37	LAKE HAVASU CITY	AZ	FM	266 : 101.1 MHz	C1	LIC	133	23.10	7.10	825	1st Adj	156.10	237

Klein Broadcast Engineering, L.L.C.

Job: SELIGMAN, AZ 267 A.fmj

Master Database: 2002_MAR_29A.fmd

Lat: N35:19:26 Lon: W112:45:55

Channel: 267 Class: A

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Primary, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 30 km

Comments: NPR Reply Comments ENGINEERING EXHIBIT E-3B

Proposed Channel Substitution for STATION KZKE(FM) at Existing Station coordinates.

Description:

Page 1 of 1

Date: 3/30/2002 12:29:53 PM

rfDetective-FM Version 1.3.4

Callsign	Latitude	Longitude	City	State	Service	Channel	Class	Status	Min Separation	Clearance	ERP	HAAT	Adjacency	Distance	Bearing
KRRK	N34:33:06	W114:11:37	LAKE HAVASU CITY	AZ	FM	266 : 101.1 MHz	C0	CP	152	4.10	20.00	822	1st Adj	156.10	237
KESP	N34:25:48	W111:30:16	PAYSON	AZ	FM	266 : 101.1 MHz	C1	CP	133	19.06	57.00	377	1st Adj	152.06	131
KESP	N34:25:48	W111:30:16	PAYSON	AZ	FM	266 : 101.1 MHz	C1	LIC	133	19.06	77.00	326	1st Adj	152.06	131
KRRK(FM)	N34:33:06	W114:11:37	YUCCA	AZ	FM	266 : 101.1 MHz	C1	ADD	133	23.10	0.00	0	1st Adj	156.10	237
KRRK	N34:33:06	W114:11:37	LAKE HAVASU CITY	AZ	FM	266 : 101.1 MHz	C1	LIC	133	23.10	7.10	825	1st Adj	156.10	237

Klein Broadcast Engineering, L.L.C.

Job: SELIGMAN, AZ 254 A.fmj

Master Database: 2002_MAR_29A.fmd

Lat: N35:19:26 Lon: W112:45:55

Channel: 254 Class: A

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Primary, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 30 km

Comments: NPR Reply Comments ENGINEERING EXHIBIT E-3C

Proposed Channel Substitution for STATION KZKE(FM) at Existing Station coordinates.

Description:

Page 1 of 1

Date: 3/30/2002 12:32:54 PM

rfDetective-FM Version 1.3.4

Callsign	Latitude	Longitude	City	State	Service	Channel	Class	Status	Min Separation	Clearance	ERP	HAAT	Adjacency	Distance	Bearing
	N36:03:31	W112:36:55	GRAND CANYON VILL	AZ	FM	257 : 99.3 MHz	C	ADD	95	-12.36	0.00	0	3rd Adj	82.64	009
KKLT	N33:19:58	W112:03:48	PHOENIX	AZ	FM	254 : 98.7 MHz	C	LIC	226	4.12	99.00	545	Primary	230.12	164
	N35:19:42	W112:08:36	WILLIAMS	AZ	FM	257 : 99.3 MHz	C3	ADD	42	14.55	0.00	0	3rd Adj	56.55	090
KJKI	N35:17:50	W111:00:34	LEUPP	AZ	FM	255 : 98.9 MHz	C1	CP	133	26.71	52.00	12	1st Adj	159.71	091

Klein Broadcast Engineering, L.L.C.
 Job: CHINO VALLEY, AZ 223 A.fmj
 Master Database: 2002_MAR_29A.fmd
 Lat: N34:46:10 Lon: W112:31:03
 Channel: 223 Class: A

Page 1 of 1
 Date: 3/30/2002 12:35:46 PM
 rfDetective-FM Version 1.3.4

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved
 Channels: Primary, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6
 Range: 30 km
 Comments: NPR Reply Comments ENGINEERING EXHIBIT E-4
 DOCKET MM 01-264 Proposed Allotment
 Description:

Callsign	Latitude	Longitude	City	State	Service	Channel	Class	Status	Min Separation	Clearance	ERP	HAAT	Adjacency	Distance	Bearing
	N34:46:10	W112:31:03	CHINO VALLEY	AZ	FM	223 : 92.5 MHz	A	ADD	115	-115.00	0.00	0	Primary	0.00	000
KKFR	N33:20:01	W112:03:44	GLENDALE	AZ	FM	222 : 92.3 MHz	C	LIC	165	-0.28	98.00	500	1st Adj	164.72	165
KAFF-FM	N34:58:07	W111:30:24	FLAGSTAFF	AZ	FM	225 : 92.9 MHz	C	LIC	95	0.03	98.00	461	2nd Adj	95.03	077
KRCY	N35:39:07	W114:18:42	DOLAN SPRINGS	AZ	FM	224 : 92.7 MHz	C	CP	165	25.46	100.00	541	1st Adj	190.46	301

Klein Broadcast Engineering, L.L.C.
 Job: CHINO VALLEY, AZ 232 C3.fmj
 Master Database: 2002_MAR_29A.fmd

Lat: N34:52:03 Lon: W112:33:04

Channel: 232 Class: C3

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Primary, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 30 km

Comments: NPR Reply Comments ENGINEERING EXHIBIT E-5

SITE RESTRICTED: 14.7km NNW of Chino Valley, AZ on a bearing of 323 degrees T.

Description:

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Date: 3/30/2002 12:39:01 PM

rfDetective-FM Version 1.3.4

Callsign	Latitude	Longitude	City	State	Service	Channel	Class	Status	Min Separation	Clearance	ERP	HAAT	Adjacency	Distance	Bearing
KMGH	N34:58:08	W111:30:28	FLAGSTAFF	AZ	FM	230 : 93.9 MHz	C	LIC	96	0.00	96.00	460	2nd Adj	96.00	083
KOOL-FM	N33:20:02	W112:03:42	PHOENIX	AZ	FM	233 : 94.5 MHz	C	LIC	176	0.00	100.00	504	1st Adj	176.00	165
KSWG	N33:55:34	W112:47:40	WICKENBURG	AZ	FM	231 : 94.1 MHz	C3	LIC	99	7.80	6.40	197	1st Adj	106.80	192
	N33:57:00	W113:10:30	AGUILA	AZ	FM	231 : 94.1 MHz	C3	ADD	99	17.83	0.00	0	1st Adj	116.83	209
	N35:12:27	W112:37:49	ASH FORK	AZ	FM	285 : 104.9 MHz	A	ADD	12	26.40	0.00	0	IF	38.40	349
KZZZ	N35:06:40	W113:53:08	KINGMAN	AZ	FM	234 : 94.7 MHz	C	LIC	96	28.80	46.00	760	2nd Adj	124.80	283

Klein Broadcast Engineering, L.L.C.

Job: GILBERT, AZ 280 C1.fmj

Master Database: 2002_MAR_29A.fmd

Lat: N33:25:39 Lon: W111:28:03

Channel: 280 Class: C1

Status: Licensed, Construction Permit, Application, Addition, Vacant/Reserved

Channels: Primary, 1st Adj, 2nd Adj, 3rd Adj, IF, TV6

Range: 30 km

Comments: NPR Reply Comments ENGINEERING EXHIBIT E-6

SITE RESTRICTED:29.6km NE of Gilbert, AZ on a bearing of 69 degrees T.

Clears the Proposed Allotment of FM CHANNEL 280 A at ASH FORK, AZ at coordinates: NL:35-14-24 / WL:112-36-56

Description: *KFPB Chino Valley, AZ proposes to relocate to FM Channel 232C3

Page 1 of 1

Date: 3/30/2002 12:47:13 PM

rfDetective-FM Version 1.3.4

Callsign	Latitude	Longitude	City	State	Service	Channel	Class	Status	Min Separation	Clearance	ERP	HAAT	Adjacency	Distance	Bearing
KEDJ	N33:23:59	W111:26:45	GILBERT	AZ	FM	280 : 103.9 MHz	C2	APP	224	-220.32	50.00	150	Primary	3.68	147
KPTY	N33:14:50	W111:31:49	GILBERT	AZ	FM	280 : 103.9 MHz	C2	LIC	224	-203.17	48.00	150	Primary	20.83	196
KFPBZ	N34:42:52	W112:31:33	CHINO VALLEY	AZ	FM	280 : 103.9 MHz	C3	LIC	211	-38.02	8.10	173	Primary	172.98	326
KZPT	N32:17:23	W111:01:06	TUCSON	AZ	FM	281 : 104.1 MHz	A	APP	133	0.00	3.00	100	1st Adj	133.00	162
KZPT	N32:17:23	W111:01:06	TUCSON	AZ	FM	281 : 104.1 MHz	A	CP	133	0.00	3.00	100	1st Adj	133.00	162
KLNZ	N33:35:33	W112:34:49	GLENDALE	AZ	FM	278 : 103.5 MHz	C	LIC	105	0.00	48.00	740	2nd Adj	105.00	280
KZPT	N32:17:23	W111:01:05	TUCSON	AZ	FM	281 : 104.1 MHz	A	LIC	133	0.01	3.00	31	1st Adj	133.01	162
KBZG	N34:25:48	W111:30:16	PAYSON	AZ	FM	282 : 104.3 MHz	C	CP	105	6.25	86.00	600	2nd Adj	111.25	358
KBZG	N34:25:48	W111:30:16	PAYSON	AZ	FM	282 : 104.3 MHz	C	LIC	105	6.25	91.00	326	2nd Adj	111.25	358
KDKB	N33:20:04	W112:03:36	MESA	AZ	FM	227 : 93.3 MHz	C	LIC	41	15.09	96.00	469	IF	56.09	259
	N30:58:57	W110:18:01	CANANEA	SO	FM	280 : 103.9 MHz	B		270	22.60	0.00	0	Primary	292.60	158
	N31:35:30	W112:19:30	SAN FRANCISQUITO	SO	FM	280 : 103.9 MHz	A		196	22.95	0.00	0	Primary	218.95	202

EXHIBIT B

MULLANEY ENGINEERING, INC.

9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

ENGINEERING EXHIBIT EE-RM:

**JOINT REPLY COMMENTS AND
MODIFIED COUNTERPROPOSAL
MM DOCKET 02-12 - ASH FORK, ARIZONA**

**RULE MAKING TO AMEND
FM TABLE OF ALLOTMENTS**

**ADDITION OF
ALLOT Ch. 282C1 TO FREDONIA, AZ
MOVE Ch. 224C TO MOAPA VALLEY, NV
AND CHANGES AT THREE OTHER CITIES
&
NPR PHOENIX, LLC PROPOSAL
ALLOT Ch. 285C3 AT PEACH SPRINGS, AZ
UPGRADE TO Ch. 280C1 AT GILBERT, AZ
AND CHANGES AT TWO OTHER CITIES**

MARCH 29, 2002

**A COMPLETE REPLACEMENT OF ENGINEERING
ENGINEERING STATEMENT PREPARED ON BEHALF OF
SPECTRUM SCAN, LLC
LICENSEE OF KRCY (FM)
CHANNEL 224C - DOLAN SPRINGS, ARIZONA**

Facility ID: 27982

ENGINEERING EXHIBIT EE-RM:

**JOINT REPLY COMMENTS AND
MODIFIED COUNTERPROPOSAL
MM DOCKET 02-12 - ASH FORK, ARIZONA**

**RULE MAKING TO AMEND
FM TABLE OF ALLOTMENTS**

**ADDITION OF
ALLOT Ch. 282C1 TO FREDONIA, AZ
MOVE Ch. 224C TO MOAPA VALLEY, NV
AND CHANGES AT THREE OTHER CITIES**

TABLE OF CONTENTS:

1. Declaration of Engineer
2. Narrative Statement
3. Channel Allocation Studies
4. Figure 1, Ch. **282C1** - Fredonia, AZ - Special Ref Site. - **REVISED**
5. Figures 2 & 3, **Omitted - No Longer Relevant**
6. Figure 4, Ch. 224C - Moapa Valley, NV - Desired KRCY Ref Site.
7. Figure 5, Ch. 221C - Cedar City, UT - KXFF Lic Site.
8. Figure 6, Ch. 222A - Tusayan, AZ - KSGC Lic Site.
9. Figure 7-A, Ch. 246A - Beaver, UT - RM Ref Site.
10. Figure 7-B, Ch. 261A - Beaver, UT - RM Ref Site.

Figure 1 has been revised in reply comments.

Figure 4-7 are same as originally filed in initial comments.

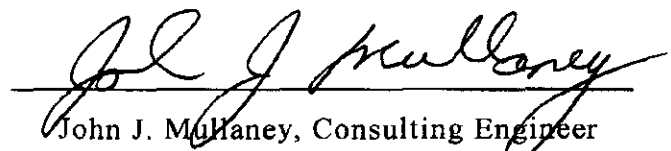
MULLANEY ENGINEERING, INC.

Declaration

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E. and my qualifications are known to the Federal Communications Commission, and that I am an principal engineer in the firm of Mullaney Engineering, Inc., and that I have provided engineering services in the area of telecommunications since 1977. My qualifications as an expert in radio engineering are a matter of record with the Federal Communications Commission.

The firm of Mullaney Engineering, Inc., has been requested by Spectrum Scan, LLC, to prepare the instant engineering exhibit in support of Joint Reply Comments and a Modified Counterproposal concerning a rule making petition to amend the FM Table of Allotments MM Docket 02-12 Ash Fork, Arizona.

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.


John J. Mullaney, Consulting Engineer
Executed on the 29th day of March 2002

ENGINEERING EXHIBIT EE-RM:

**JOINT REPLY COMMENTS AND
MODIFIED COUNTERPROPOSAL
MM DOCKET 02-12 - ASH FORK, ARIZONA**

**RULE MAKING TO AMEND
FM TABLE OF ALLOTMENTS**

**ADDITION OF
ALLOT Ch. 282C1 TO FREDONIA, AZ
MOVE Ch. 224C TO MOAPA VALLEY, NV
AND CHANGES AT THREE OTHER CITIES**

NARRATIVE STATEMENT:

This engineering statement has been prepared on behalf of Spectrum Scan, LLC ("Spectrum Scan"), licensee of Radio Station KRCY, at Dolan Springs, Arizona (Facility ID 27982). This engineering exhibit supports Joint Reply Comments and a Spectrum Scan's portion of a Modified Counterproposal in response to a Notice of Proposed Rule Making (NPRM) in MM Docket 02-12 at Ash Fork, Arizona.

Spectrum Scan and NPR Phoenix, LLC, filed separate counterproposals in the Ash Fork docket. Since that time both proponents have agreed to modify their proposals as necessary to eliminate all conflicts thereby permitting the cities of Ash Fork, Fredonia, Gilbert and Peach Springs, Arizona & of Moapa Valley, Nevada, to obtain the proposed additional or expanded FM services. This is Spectrum Scan's portion.

Originally, Spectrum Scan proposed the use of Ch. 285C1 at Fredonia and this was in conflict with the NPRM proposal to allot 285A at Ash Fork,

AZ. However, NPR in its counterproposal requested the allotment of 285C3 at Peach Springs, AZ. The NPR proposal was also short spaced with Ash Fork and was subsequently short spaced with Fredonia. In order to resolve this conflict, it was determined that a 30.5 km site restriction to the west of Fredonia would permit the use of Ch. 282C1 in lieu of the originally requested 285C1 allotment. The use of 282C1 at Fredonia eliminates the need to change the proposals to allot of 285A at Ash Fork and of 223A at Chino Valley. However, NPR will still require a substitute channel at Ash Fork as part of its proposal to allot 285C3 at Peach Springs, AZ.

This engineering statement is a **total replacement for that currently on file**. Figure 1 is being replaced to specify the new alternate channel and Figures 2 & 3 have been omitted since there are no longer relevant. All other figures remain unchanged.

Spectrum Scan herein modifies its counterproposal which thereby permits the allotment of a first service (282C1) at Fredonia, AZ, and for KRCY to relocate its Ch. 224C (CP) facility from Dolan Springs, AZ to Moapa Valley, NV and to modify the license of KRCY accordingly. In order to accomplish this it is necessary to swap channels at three other cities. The existing facilities of KXFF (Facility ID: 61386) on 223C at Cedar City, UT and of KSGC (Facility ID: 68417) on 221A at Tusayan, AZ, will require a show cause order for an involuntary modification of facilities (new channels from existing sites).

The city of Dolan Springs (1,867 persons, 2000 Census) will continue to be served by one aural service (KOAS FM 289C) and grant of this proposal will result in the **second** aural service to Moapa Valley, NV (5,784 persons, 2000 Census).

KRCY wishes to point out that the new city of license it seeks is on its existing channel with a proposed location which is less than the separation specified by Section 73.207 and, thus, is mutually exclusive with its existing authorization in accordance with Section 1.420(i) of the rules.

The proposed reference point is not within 290 kilometers (180 miles) of a United States Border and, therefore, foreign concurrence is not required.

REVISED COUNTERPROPOSAL

Ch. 282C1 - Fredonia, AZ

For the purposes of this rule making the allotment of **Ch. 282C1** will rely upon use of a special reference point located 30.5 km east-southeast of the city of **Fredonia, AZ**.

N. Latitude:	36°	50'	40"	NAD-27
W. Longitude:	112°	13'	00"	.

The proposed reference site will provide an unobstructed view of the city of license, Fredonia and is located close enough to serve the entire community with the required 3.16 mV/M or 70 dBu contour. A Class C1 uses a city grade radius of 50 km for allotment purposes. In addition, there is an unobstructed view of the city from the proposed reference coordinates and using the standard 3-16 km coverage projection the 70 dBu contour extends 65 km or 35 km beyond the city.

Ch. 224C - Moapa Valley, NV

For the purposes of this rule making the allotment of **Ch. 224C** will rely upon the use of a special reference point located 14.1 km west of the **Moapa Valley, NV**.

N. Latitude: 36° 35' 06" NAD-27
W. Longitude: 114° 36' 01"

KRCY requests use of this special reference point since it is known to permit the erection of a tower of sufficient height to achieve maximum Class C HAAT (600 meters). The proposed reference site will provide an unobstructed view of the city of license, Moapa Valley and is located close enough to serve the entire community with the required 3.16 mV/M or 70 dBu contour. A Class C uses a city grade radius of 67 km for allotment purposes. In addition, there is an unobstructed view of the city from the proposed reference coordinates.

Channel Allocation Studies

Figures 1 to 7 are channel studies demonstrating that the proposed use of the specified channel is in full compliance with the FCC's separation requirements.

As previously noted, Figures 2 & 3 are no longer relevant and have not been included. While Figure 1 has been revised, Figures 4, 5, 6, 7-A & 7-B remain unchanged.

Only KRCY at Moapa Valley proposes a new transmitter site. All other channels rely on the licensed site of the affected station, city reference coordinates or the reference point proposed in the pending rule making as indicated by the FCC's CDBS data base. The studies indicate the actual & required separation in kilometers to all licenses, construction permits, applications, vacant allocations and pending rule makings. From these studies it can be determined that proposed reference points exceed all of these minimum separations provided the additional swaps are implemented.

Figure 1 demonstrates that the proposed use of **Ch. 282C1** from a special reference point located 30.5 km east-southeast of the city of Fredonia, AZ, complies with the rules. This modified proposal no longer requires the

substitution of any other channel. Although no channel study is submitted the proposed reference coordinates also permit the allotment of Ch. 283C1. In addition, Ch. 278C1 also works from the following reference site which is 30.8 km from Fredonia: 36-53-00 / 112-11-40. This alternate site is just 4.8 km NNE of the reference point for 282C1/283C1 and as such easily provides city grade coverage.

Figure 4 demonstrates that the proposed use of **Ch. 224C** from the special reference coordinates requested by KRCY at Moapa Valley, NV, complies with the rules. The study indicates that the proposed site is below the required separation to both the license & CP locations of KRCY (as required by Section 1.420(i)). In addition, it indicates that the city reference point of Moapa Valley is located 14.1 km (8.8 miles) on a bearing of N-106.7-E from the proposed site. This proposal requires the substitution of Ch. 221C for 223C at Cedar City, UT (KXFF).

Figure 5 demonstrates that the proposed use of **Ch. 221C** from the currently licensed site of KXFF at Cedar City, UT, complies with the rules. This proposal requires the substitution of Ch. 222A for 221A at Tusayan, AZ (KSGC) and of 246A or 261A for the pending allotment of 221A at Beaver, UT. It should be noted that the license of KRDC on 219A at St. George, UT, has expired per FCC letter dated 6/12/2000.

Figure 6 demonstrates that the proposed use of **Ch. 222A** from the currently licensed site of KSGC at Tusayan, AZ, complies with the rules.

Figure 7-A demonstrates that the proposed use of **Ch. 246A** from the RM reference coordinates for Beaver, UT, complies with the rules. Similarly Figure 7-B demonstrates that **Ch. 261A** also complies with the rules. These figures rely on corrected coordinates as submitted by the RM proponent (38 degrees for latitude not the 36 degrees originally specified).

Public Interest Showing

Spectrum Scan proposes the allotment of a first local service to the city of Fredonia, AZ. According to the 2000 Census the population of Fredonia is 1,036 persons. This modified allotment proposal requires no further changes.

The re-allotment of Ch. 224C from Dolan Springs, AZ (1,867 persons) to Moapa Valley, NV (5,784 persons) will permit KRCY to continue to provide a **second** local service but to a community which has a population which is **three times as large**. KRCY presently holds a CP to operate as a Class C facility with near maximum facilities (100 kW at 541 meters HAAT). The proposed change in community & continued operation with Class C facilities will permit KRCY to serve more population. KRCY's CP is presently authorized to provide a 60 dBu service to 891,880 persons. KRCY anticipates construction of a maximum Class C facility which will potentially provide 60 dBu service to 1,363,600 persons (2000 Census). This represents a **52.9% increase** in population.

Spectrum Scan has presented a joint modified reply plan which is a more efficient use of the limited frequency spectrum in & around Nevada and Arizona. All cities currently being considered for new allotments or which have existing allotments receive one under this plan.

Based upon the above information, Spectrum Scan believes that its request results in a preferential arrangement of allotments and therefore, serves the public interest.

SUMMARY

Spectrum Scan, LLC, licensee of Radio Station KRCY, at Dolan Springs, Arizona (Facility ID 27982) requests that the FM Table of Allotments be amended as presented herein. Spectrum Scan through these **Joint Reply Comments** modifies its original counterproposal which thereby permits the allotment of a first service (282C1) at Fredonia, AZ, and for KRCY to relocate its Ch. 224C facility from Dolan Springs, AZ to Moapa Valley, NV and to modify the license of KRCY accordingly. In order to accomplish this it is necessary to swap channels at three other cities. Only KRCY at Moapa Valley proposes a new transmitter site. All other channels rely on the licensed site of the affected station, city reference coordinates or the reference point proposed in the pending rule making as indicated by the FCC's CDBS data base.

Spectrum Scan requests that the Commission's FM Table of Allotments be revised as follows:

Community	Present	Proposed in NPRM	Counterproposal
Ash Fork, AZ #	--	285A	280A
Fredonia, AZ ##	--	--	282C1 or 283C1 or 278C1
Dolan Springs, AZ	224C, 289C	[224C, 289C]	289C
Moapa Valley, NV	284A	[284A]	224C, 284A
Cedar City, UT	223C	[223C]	221C
Tusayan, AZ	221A	[221A]	222A
Beaver, Utah ##	221A-proposed	[221A-proposed]	246A or 261A

- No direct conflict continues to exists with Ash Fork.

- only one channel requested.

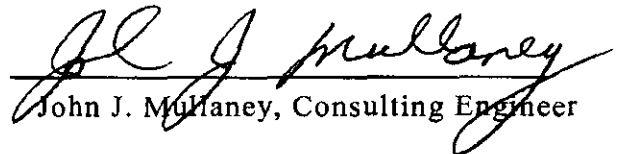
[] - item is not specifically in pending NPRM

Joint Reply Comments & Modified Counterproposal
MM Docket 02-12 - Ash Fork, AZ
Fredonia, AZ & Moapa Valley, NV
March 29, 2002

MULLANEY ENGINEERING, INC.

Based upon the joint modified proposal presented herein, Spectrum Scan believes that its request results in a preferential arrangement of allotments and therefore, serves the public interest. If granted, KRCY will quickly file an application for construction permit and agrees to reimburse all reasonable expenses of KXFF at Cedar City, UT and of KSGC at Tusayan, AZ. In addition, at the appropriate time Spectrum Scan will file for the Fredonia allotment.

This engineering statement represents the modified proposal of Spectrum Scan, LLC. A separate statement will detail the proposal by NPR Phoenix, LLC.


John J. Mullaney, Consulting Engineer

March 29, 2002.

March 2002 - Joint Settlement

REFERENCE

36 50 40 N
112 13 00 W

CLASS = C1

Current Spacings

----- Channel 282 - 104.3 MHz -----

DISPLAY DATES

DATA 03-27-02

SEARCH 03-29-02

Call	Channel	Location		Dist	Azi	FCC	Margin	
KR-01	285C1	Fredonia-new	AZ	30.55	295.9	82.0	-51.45	Self
ALLO	ADD 280C	Toquerville	UT	105.18	296.0	105.0	0.18	
KAJM.C	CP 282C	Payson	AZ	275.54	166.3	270.0	5.54	
KAJM	LIC 282C	Payson	AZ	275.54	166.3	270.0	5.54	
KJUL	LIC 282C	North Las Vegas	NV	310.33	252.6	270.0	40.33	
KSNM	LIC 228C2	St. George	UT	113.67	270.5	27.0	86.67	
RDEL	DEL 228C2	St. George	NV	113.67	270.5	27.0	86.67	
ALLO	USE 228C2	St. George	UT	124.45	284.4	27.0	97.45	

Special reference site is 30.5 km East-Southeast of Fredonia, AZ

CH. 282 C1 IS FIRST LOCAL COMMERCIAL SERVICE TO FREDONIA, AZ

282C1 - FREDONIA, AZ - SPECIAL REF SITE

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Ash Fork, Arizona

Spectrum Scan - Fredonia, AZ & Moapa Valley, NV

MULLANEY ENGINEERING, INC.

GAITHERSBURG, MARYLAND

FIGURE 1 - Revised

MARCH 2002

DESIRED SITE FOR KRCY

36 35 06 N
114 36 01 W

CLASS = C

Current Spacings

DISPLAY DATES

DATA 03-15-02
SEARCH 03-15-02

----- **Channel 224 - 92.7 MHz** -----

Call	Channel	Location		Dist	Azi	FCC	Margin	
KR-04	224C	MOAPA VALLEY-RM	NV	14.10	106.0	289.5	-275.40	CITY
KRCY.C CP	224C	Dolan Springs	AZ	106.74	165.9	289.5	-182.76	SELF
KRCY LIC	224C1	Kingman	AZ	173.52	172.9	269.5	-95.98	SELF
KXFF LIC	223C	Cedar City	UT	160.32	42.3	240.5	-80.18	MX
KQOLFM LIC	226C	Las Vegas	NV	106.11	229.9	104.5	1.61	
KOMP LIC	222C	Las Vegas	NV	106.15	229.8	104.5	1.65	
KISF LIC	278C	Las Vegas	NV	73.65	209.6	47.5	26.15	
KR-05	221C	Cedar City-KXFF	UT	160.32	42.3	104.5	55.82	ALT

1. Moapa Valley & KRCY-CP are Mutually Exclusive / Short Spaced.
2. No short spacing if KXFF moves to Ch. 221C.

224C - MOAPA VALLEY, NV - DESIRED SITE KRCY

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Ash Fork, Arizona

Spectrum Scan - Fredonia, AZ & Moapa Valley, NV

MULLANEY ENGINEERING, INC.

GAITHERSBURG, MARYLAND

FIGURE 4

MARCH 2002

REFERENCE

37 38 41 N
113 22 28 W

CLASS = C**Current Spacings****DISPLAY DATES****DATA 03-15-02****SEARCH 03-15-02**

----- Channel 221 - 92.1 MHz -----

Call	Channel	Location		Dist	Azi	FCC	Margin	
KR-05	221C	Cedar City-KXFF	UT	0.00	0.0	289.5	-289.50	ALT
KXFF	LIC 223C	Cedar City	UT	0.00	0.0	104.5	-104.50	SELF
RM	221A	Beaver	UT	95.33	42.3	225.5	-130.17	MX
DKRDC-	LIC 219A	St. George	UT	62.30	195.7	94.5	-32.20	EXPIRED
KSGC	LIC 221A	Tusayan	AZ	216.38	148.9	225.5	-9.12	MX
KLNR	LIC 219C3	Panaca	NV	109.57	285.0	95.5	14.07	
ALLO	VAC 275C3	Hurricane	UT	52.66	171.8	30.5	22.16	
KR-04	224C	MOAPA VALLEY-RM	AZ	154.54	218.4	104.5	50.04	
KR-06	222A	Tusayan-KSGC	AZ	216.38	148.9	164.5	51.88	

1. No short spacing if Beaver moves to 246A or 261A.
2. No short spacing if KSGC moves to Ch. 222A.
3. Lic of KRDC Expired per FCC ltr 6/21/2000.

221C - CEDAR CITY, UT - KXFF LIC SITE

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Ash Fork, Arizona

Spectrum Scan - Fredonia, AZ & Moapa Valley, NV

**MULLANEY ENGINEERING, INC.
GAITHERSBURG, MARYLAND**

FIGURE 5

MARCH 2002

REFERENCE

35 58 14 N
112 07 53 W

CLASS = A**Current Spacings****Channel 222 - 92.3 MHz****DISPLAY DATES****DATA 03-15-02****SEARCH 03-15-02**

Call	Channel	Location		Dist	Azi	FCC	Margin	
KR-06	222A	Tusayan-KSGC	AZ	0.00	0.0	114.5	-114.50	ALT
KSGC	LIC 221A	Tusayan	AZ	0.00	0.0	71.5	-71.50	SELF
KR-02	223A	Ash Fork-ADD	AZ	95.98	208.1	71.5	24.48	ALT
KAFFFM	LIC 225C	Flagstaff	AZ	124.79	152.9	94.5	30.29	
KNAD	LIC 219C2	Page	AZ	92.27	28.8	54.5	37.77	
KR-05	221C	Cedar City-KXFF	UT	216.38	329.6	164.5	51.88	ALT
KXFF	LIC 223C	Cedar City	UT	216.38	329.6	164.5	51.88	

222A - TUSAYAN, AZ - KSGC LIC SITE**Counterproposal MM Docket 02-12****Ash Fork, Arizona****Spectrum Scan - Fredonia, AZ & Moapa Valley, NV****MULLANEY ENGINEERING, INC.
GAITHERSBURG, MARYLAND****FIGURE 6****MARCH 2002**

REFERENCE

38 16 37 N

112 38 25 W

CLASS = A

Current Spacings

DISPLAY DATES

DATA 03-15-02

SEARCH 03-15-02

----- Channel 246 - 97.1 MHz -----

Call	Channel	Location		Dist	Azi	FCC	Margin
KR-07A	246A	Beaver-ADD	UT	0.00	0.0	114.5	-114.50 ALT
ALLO	ADD 300C2	Parowan	UT	50.96	198.5	14.5	36.46
KISNFM	CP 246C	Salt Lake City	UT	267.19	8.0	225.5	41.69
KISNFM	LIC 246C	Salt Lake City	UT	267.22	8.0	225.5	41.72
KLGL	LIC 248C	Richfield	UT	138.42	32.6	94.5	43.92
KLGL.C	CP 248C	Richfield	UT	138.43	32.7	94.5	43.93
KCFM.C	CP 244C	Levan	UT	156.52	40.8	94.5	62.02
ALLO	RSV 244C1	Levan	UT	160.60	27.2	74.5	86.10
KCYN.A	APP 246C1	Moab	UT	292.59	83.5	199.5	93.09
KCYN.C	CP 246C1	Moab	UT	294.26	83.5	199.5	94.76

1. Proponent of RM requested "correction" of latitude from 36 deg to 38 deg.

246A - BEAVER, UT - CITY REF SITE

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Ash Fork, Arizona

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MULLANEY ENGINEERING, INC.

GAITHERSBURG, MARYLAND

FIGURE 7-A

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REFERENCE

38 16 37 N
112 38 25 W

CLASS = A**Current Spacings****Channel 261 - 100.1 MHz****DISPLAY DATES****DATA 03-15-02****SEARCH 03-15-02**

Call	Channel	Location		Dist	Azi	FCC	Margin
KR-07B	261A	Beaver-ADD	UT	0.00	0.0	114.5	-114.50 ALT
KONY.A APP	260C	St. George	UT	175.61	205.5	164.5	11.11
ALLO RSV	260C	St. George	UT	175.61	205.5	164.5	11.11
KONY LIC	259C	St. George	UT	175.61	205.5	94.5	81.11

1. Proponent of RM requested "correction" of latitude from 36 deg to 38 deg.

261A - BEAVER, UT - CITY REF SITE**Counterproposal MM Docket 02-12****Ash Fork, Arizona****Spectrum Scan - Fredonia, AZ & Moapa Valley, NV****MULLANEY ENGINEERING, INC.
GAITHERSBURG, MARYLAND****FIGURE 7-B
MARCH 2002**

EXHIBIT C

Page 1

COMMUNITY	NPRM MM DOCKET 02-12		NPR PHOENIX, LLC COUNTERPROPOSAL		SPECTRUM SCAN, LLC COUNTERPROPOSAL		GLOBAL RESOLUTION: KEDJ COMPONENT	
	PRESENT	PROPOSED	PRESENT	PROPOSED	PRESENT	PROPOSED	PRESENT	PROPOSED
Ash Fork, Arizona	---	(New) 285A (35° 12' 27", 112° 37' 49")	---	(New) 280A, (35° 13' 24" 112° 36' 56")	-	(New) 223A (35° 12' 27", 112° 37' 49")	-	(New) 280A (35° 13' 24", 112° 36' 56")
Peach Springs, Arizona			---	(New) 285C3 (35° 31' 39", 113° 19' 49")			---	(New) 285C3 (35° 31' 39", 113° 19' 49")
Seligman, Arizona			(KZKE Lic.) 277A (35° 19' 26", 112° 45' 55")	(KZKE Shift) 254A, or 227A, or 265A, or 267A (35° 19' 26", 112° 45' 55")			(KZKE Lic.) 277A (35° 19' 26", 112° 45' 55")	(KZKE Shift) 227A, or 265A, or 267A, or 254A (35° 19' 26", 112° 45' 55")
Chino Valley, Arizona			(KFPB Lic.) 280C3 (34° 52' 52", 112° 31' 33")	(KFPB Shift) 232C3 (34° 52' 03", 112° 33' 04")	[(New) Ch 223A, proposed in MM 01-264, 34° 46' 10", 112° 31' 03"]	(New) 232A (34° 46' 10", 112° 31' 03")	(KFPB Lic.) 280C3 (34° 42' 52", 112° 31' 33")	[(New), 223A MM 01- 264 34° 46' 10", 112° 31' 03")], (KFPB Shift) 232C3 (34° 52' 03", 112° 33' 04")
Gilbert, Arizona			(KEDJ Lic.) 280C2 (33° 14' 50", 111° 31' 49")	(KEDJ Shift) 280C1 (33° 25' 39", 111° 28' 03")			(KEDJ Lic.) 280C2 (33° 14' 50", 111° 31' 49")	(KEDJ Shift) 280C1 (33° 25' 39", 111° 28' 03")

(End of NPR Component of Global Resolution)

COMMUNITY	NPRM MM DOCKET 02-12		NPR PHOENIX, LLC COUNTERPROPOSAL		SPECTRUM SCAN, LLC COUNTERPROPOSAL		GLOBAL RESOLUTION: KRCY COMPONENT	
	PRESENT	PROPOSED	PRESENT	PROPOSED	PRESENT	PROPOSED	PRESENT	PROPOSED
Fredonia, Arizona					—	(New) 285C1 (36° 57' 50", 112° 31' 32")	—	(New) 282C1 or 283C1 (either of the these two at 36° 50' 40", 112° 13' 00") or 278C1 (36° 53' 00", 112° 11' 40")
Dolan Springs, Arizona					(KRCY CP) 224C (35° 39' 07", 114° 18' 42"), (KOAS Lic.) 289C (35° 39' 07", 114° 18' 42")	289C (KOAS Lic.) (35° 39' 07", 114° 18' 42")	224C (KRCY CP) (35° 39' 07", 114° 18' 42"), (KOAS Lic.) 289C (35° 39' 07", 114° 18' 42")	(KOAS Lic.) 289C (35° 39' 07", 114° 18' 42") (no change to licensed KOAS facility)
Moapa Valley, Nevada					(KBHQ CP) 284C1 (36° 42' 33" 114° 32' 35") (KRCY Shift) 224C (36° 35' 06", 114° 36' 01")	(KBHQ CP) 284C1 (36° 42' 33" 114° 32' 35"), (KRCY Shift) 224C (36° 35' 06", 114° 36' 01")	(KBHQ CP) 284C1 (36° 42' 33" 114° 32' 35")	(KBHQ CP) 284C1 (36° 42' 33" 114° 32' 35"), (KRCY Shift) 224C (36° 35' 06", 114° 36' 01")
Cedar City, Utah					(KXFF Lic.) 223C (37° 38' 41", 113° 22' 28")	(KXFF Shift) 221C (37° 38' 41", 113° 22' 28")	(KXFF Lic.) 223C (37° 38' 41", 113° 22' 28")	(KXFF Shift) 221C (37° 38' 41", 113° 22' 28")

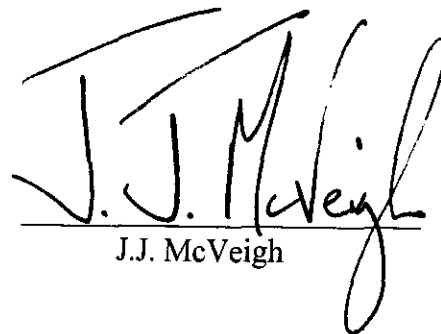
(KRCY COMPONENT OF GLOBAL RESOLUTION CONTINUES ON THE NEXT PAGE)

COMMUNITY	NPRM MM DOCKET 02-12		NPR PHOENIX, LLC COUNTERPROPOSAL		SPECTRUM SCAN, LLC COUNTERPROPOSAL		GLOBAL RESOLUTION: KRCY COMPONENT (CONTINUED)	
	PRESENT	PROPOSED	PRESENT	PROPOSED	PRESENT	PROPOSED	PRESENT	PROPOSED
T usayan, Arizona					(KSGC Lic.) 221A (35° 58' 14" 112° 07' 53")	(KSGC Shift) 222A (35° 58' 14" 112° 07' 53")	(KSGC Lic.) 221A (35° 58' 14" 112° 07' 53")	(KSGC Shift) 222A (35° 58' 14" 112° 07' 53")
Beaver, Utah					[(New, Undocketed) 221A (38° 16' 37", 112° 38' 25")]	(New) 246A or 261A ((38° 16' 37" 112° 38' 25"))	[(New, Undocketed) 221A (38° 16' 37" 112° 38' 25")]	(New) 246A or 261A (38° 16' 37" 112° 38' 25")

CERTIFICATE OF SERVICE

I hereby certify that I have this Second day of April, 2002, sent a copy of the foregoing **JOINT REPLY COMMENTS** by first class United States mail, postage prepaid, to:

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Route 66 Broadcasting, L.L.C. 812 East Beale Street, Kingman, Arizona 86401 Licensee, Radio Station KZKE(FM)	Tusayan Broadcasting Company, Inc. P.O. Box 3085 Grand Canyon, Arizona 86023 Licensee, Station KSGC(FM)
Prescott Radio Partners 9222 Loma Street Villa Park, California 92861 Licensee, Radio Station KFPB(FM)	Deborah Comley 11204 Bowley Drive Louisville, Kentucky 40223 Proponent, New(FM), Beaver, Utah
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J.J. McVeigh